IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| In re: |) Chapter 11 |
|---|---|
| INTEGRATED HEALTH SERVICES, INC., et al |) l.,) Case No. 00-389(MFW)) (Jointly Administered) |
| Debtors. |) |
|) |) _) |
| IHS LIQUIDATING LLC, |) |
| Plaintiff, |) |
| |) C.A. No. 05-376(GMS) |
| v. |)) |
| ACE INDEMNITY INSURANCE COMPANY | ,) |
| f/k/a INDEMNITY INSURANCE COMPANY |) |
| OF NORTH AMERICA, |) |
| Defendant. | ,) |

NOTICE OF ORAL DEPOSITION

TO: James F. Harker, Esquire Cohen, Seglias, Pallas, Greenhall & Furman, PC Nemours Bldg. - Ste. 1130 1007 Orange Street Wilmington, DE 19801

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure, Defendant, ACE Indemnity Insurance Company, will take the deposition of Ken Llano on Wednesday, February 21, 2007 at 10:00 a.m. at the offices of Chait Digital located at Two Stamford Landing, 68 Southfield Avenue, Stamford, CT 06901 and continue thereafter until completed. The deposition shall be taken before a court reporter or other officer authorized by law to take depositions.

WETZEL & ASSOCIATES, P.A.

/s/Benjamin C. Wetzel, III
BENJAMIN C. WETZEL, III (ID No. 985)
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Attorney for Ace Indemnity Insurance
Company f/k/a Indemnity Insurance
Company of North America

Of Counsel: Ward A. Rivers, Esquire Deasey, Mahoney & Bender, Ltd. 1800 John F. Kennedy Blvd., Suite 1300 Philadelphia, PA 19103-2978

Date: February 6, 2007

CERTIFICATE OF SERVICE

I certify that on February 6, 2007, I electronically filed the within Notice of Deposition with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

Garven F. McDaniel, Esquire Bifferato Gentilotti & Balick P.O. Box 2165 Wilmington, DE 19899

James F. Harker, Esquire Cohen, Seglias, Pallas, Greenhill & Furman, P.C. Nemours Building, Suite 1130 1007 Orange Street Wilmington, DE 19801

Christopher P. Simon, Esquire Cross & Simon, LLC 913 N. Market Street, 11th Floor Wilmington, DE 19801

and served through the U.S. Mail:

Lee W. Stemba, Esquire Clement H. Berne, Esquire Troutman Sanders, LLP The Chrsyler Building 405 Lexington Avenue New York, NY 10174

Joshua W. Cohen, Esquire Thomas O. Farrish, Esquire John B. Nolan, Esquire Day Berry & Howard, LLP One Audubon Street, 6th Floor New Haven, CT 06511

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Date: February 6, 2007